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*Schindler Elevator Corporation*

**UNITED STATES DISTRICT COURT**  
**FOR THE STATE OF NEVADA**

NORMA HERMINIA CANON, individually,

Plaintiff,

vs.

SAHARA HOTEL & CASINO, TK  
 ELEVATOR CORPORATION, f/k/a  
 THYSSENKRUPP ELEVATOR  
 CORPORATION, a Foreign Corporation,  
 SCHINDLER ELEVATOR  
 CORPORATION, a Foreign Corporation;  
 DOE EMPLOYEES 1-XX; DOES 1-XX,  
 ROE CORPORATIONS 1-XX, inclusive,

Defendants.

**Case No.: 2:24-cv-00137-GMN-MDC**

**JOINT STIPULATION AND ORDER FOR  
 EXTENSION OF TIME TO RESPOND TO  
 COMPLAINT**

**(First Request)**

Pursuant to LR 6-1 and 6-2, Defendant Schindler Elevator Corporation (hereinafter, “Schindler), and Plaintiff Norma Herminia Canon (“Plaintiff” and with Schindler, collectively the “Parties”) by and through their respective counsel, hereby respectfully requests the below extension of time for Schindler to respond to the Complaint.

1. This action was initially filed on November 3, 2023 in the District Court of Clark County, Nevada, bearing Case No. A-23-880932-C. Schindler was served on December 19, 2023, and removed this action to this Court on January 19, 2024.

2. The Complaint seeks to hold Schindler liable for negligence and negligent hiring, training, supervision and/or retention.

3. Pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), Schindler's responsive pleading is due January 26, 2024.

4. Good cause exists for an extension of a responsive pleading deadline for Schindler through and including February 28, 2024. An extension would not result in prejudice to any party if granted.

5. Plaintiff expressly reserves, and does not waive, any rights she may have to seek remand of this matter back to state court.

6. Counsel for Schindler met and conferred in good faith with counsel for Plaintiff, who agreed to the requested extension for the simple purpose of providing more time to respond to the complaint.

7. The other parties to this matter, TK Elevator Corporation and Las Vegas Resort Holdings, LLC, d/b/a Sahara Las Vegas have separate agreements with Plaintiff for open-ended extensions to respond to the complaint once exposure, if any, is determined.

~~8. This stipulation will stay the deadline for the discovery planning conference and filing of the Discovery Plan and Scheduling Order as required by Federal Rule of Civil Procedure 26(f).~~

WHEREFORE, the Parties respectfully request the Court enter an order granting an extension of a responsive pleading deadline for Schindler as set forth above, through and including February 28, 2024.

IT IS SO STIPULATED.

Dated: January 26, 2024.

Dated: January 26, 2024.

**EVANS FEARS SCHUTTERT  
MCNULTY MICKUS**

**SPRENZ LAW**

/s/ Jay J. Schutttert

/s/ Kevin A. Sprenz

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*Attorneys for Defendant  
Schindler Elevator Corporation*

*Attorneys for Plaintiff*

**ORDER**

The parties must submit Stipulated Discovery Plan and Scheduling Order in compliance with LR 26-1 by no later than **April 15, 2024**.

IT IS SO ORDERED.



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**Maximiliano D. Couvillier III**  
**UNITED STATES MAGISTRATE JUDGE**

DATED: January 31, 2024

Case No.: 2:24-cv-00137-GMN-MDC